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9 *Attorneys for Nelnet Servicing, LLC*

10 **UNITED STATES DISTRICT COURT**
 11 **DISTRICT OF NEVADA**

12 MIA HOEKSTRA,
 13 v.
 14 EQUIFAX INFORMATION SERVICES, LLC
 15 AND NELNET STUDENT LOAN FUNDING
 16 MANAGEMENT CORPORATION,
 17 Defendants.

18 Case No. 2:22-cv-02170-GMN-BNW

19 **AMENDED STIPULATION AND ORDER
 20 TO EXTEND DEADLINE TO RESPOND
 21 TO COMPLAINT**
 22 **(First Request)**

23 **STIPULATION**

24 Plaintiff Mia Hoekstra (“Plaintiff”), by and through her counsel of record, George Haines,
 25 Esq., of Freedom Law Firm, and, Defendant Nelnet Servicing, LLC, incorrectly sued as “Nelnet
 26 Student Loan Funding Management Corporation,” (“Nelnet”) by and through its counsel of record,
 27 Patrick J. Reilly, Esq., of the law firm of Brownstein Hyatt Farber Schreck, LLP, hereby stipulate
 28 and agree as follows:

29 1. On December 29, 2022, Plaintiff filed her Complaint For Damages Under the
 30 FCRA, 15 U.S.C. §1681 (the “Complaint”). ECF No. 1.

31 2. On or about January 5, 2023, Plaintiff served the Summons and Complaint on
 32 Nelnet.

33 3. The current deadline for Nelnet to respond to Plaintiff’s Complaint is January 26,
 34 25145998

1 2023.

2 4. Plaintiff has agreed to grant an extension for Nelnet to answer or otherwise plead in
3 response to the Complaint.

4 5. Nelnet shall have up to, and including, February 9, 2023, in which to answer or
5 otherwise plead in response to Plaintiff's Complaint.

6 6. Nelnet seeks additional time to respond to the Complaint so that it may gather
7 additional relevant documentation and information, conduct an initial investigation of the
8 Complaint's allegations in order to formulate a response to the Complaint, and confer with
9 opposing counsel regarding possible settlement of this action.

10 7. This stipulation is brought in good faith by all parties and not for purposes of delay.
11 This extension will not result in any undue delay in the administration of this case.

12 8. This is the first request for extension of time requested by the parties with respect to
13 responding to the Complaint. The parties previously submitted a stipulation and proposed order
14 for this proposed extension on January 23, 2023 (ECF No. 7) that was denied without prejudice by
15 this Court for failure to comply with LR IA 6-1(a). This Amended Stipulation corrects said
16 deficiency. Counsel apologize for this error.

17 DATED this 26th day of January, 2023.

DATED this 26th day of January, 2023.

18 /s/ Patrick J. Reilly
19 Patrick J. Reilly, Esq.
20 BROWNSTEIN HYATT FARBER
SCHRECK, LLP
21 100 North City Parkway, Suite 1600
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22 Attorneys for Nelnet Servicing, LLC

18 /s/ Gerardo Avalos
19 George Haines, Esq.
20 Gerardo Avalos, Esq.
21 FREEDOM LAW FIRM
8985 S. Eastern Avenue, Suite 350
Las Vegas, NV 89123

22 Attorneys for Mia Hoekstra

24 **ORDER**
25 **IT IS SO ORDERED**

26 **DATED:** 2:29 pm, January 27, 2023

27 

28 **BRENDA WEKSLER**
UNITED STATES MAGISTRATE JUDGE